



MEMO ENDORSED

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June 30, 2020

Honorable Valerie E. Caproni
United States District Judge
Thurgood Marshall Courthouse
United States District Court
40 Foley Square
New York, NY 10007

Re: Velasco v NYC DOE et al., 19-cv-8526 (VEC)

Dear Judge Caproni,

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 7/1/2020

Application GRANTED.
SO ORDERED.

Valerie Caproni 7/1/2020

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE

NYLAG represents plaintiff, Elisa Velasco, for the limited purpose of settlement. I write on behalf of all parties to provide an update. In addition, with defendants' consent, plaintiff requests a 60-day stay of all scheduling, until September 4, 2020, when an update will be provided. This is the parties' fourth request for this action. Your Honor previously granted 30 day stays until April 20, 2020 (ECF # 20) and May 20, 2020 (ECF# 23), and 45 days until July 3, 2020 (ECF # 25).

Ms. Velasco has continued to see improvements in her health condition, but serious ongoing medical issues continue to interfere with her ability to participate in day-to-day activities. Ms. Velasco and I have maintained regular, limited communications in accordance with her medical needs. We have made notable progress towards making decisions that will facilitate settlement. In addition, during the last stay period, Mr. Abed Bhuyan, counsel for defendants, and I began settlement discussions. I am hopeful that we can advance our settlement discussions during this next proposed stay. Defendants are also cautiously optimistic about reaching a settlement and agree that extending the stay would facilitate such an outcome, particularly in light of the fiscal effects of the Covid-19 pandemic. Most important, a stay of mediation and all matters relating to the case will also facilitate Ms. Velasco's wellbeing and recovery.

Respectfully submitted,

Susanne Keane

Susanne Toes Keane